

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Improving Public Safety Communications in	)	WT Docket 02-55
the 800 MHz Band	)	
	)	
Consolidating the 800 and 900 MHz	)	
Industrial/Land Transportation and Business	)	
Pool Channels	)	
	)	
Amendment of Part 2 of the Commission's	)	ET Docket No. 00-258
Rules to Allocate Spectrum Below 3 GHz for	)	
Mobile and Fixed Services to Support the	)	
Introduction of New Advanced Wireless	)	
Services, including Third Generation Wireless	)	
Systems	)	
	)	
Petition for Rule Making of the Wireless	)	RM-9498
Information Networks Forum Concerning the	)	
Unlicensed Personal Communications Service	)	
	)	
Petition for Rule Making of UT Starcom, Inc.,	)	RM-10024
Concerning the Unlicensed Personal	)	
Communications Service	)	
	)	
Amendment of Section 2.106 of the	)	ET Docket No. 95-18
Commission's Rules to Allocate Spectrum at	)	
2 GHz for Use by the Mobile Satellite Service	)	

To: The Commission

**PETITION FOR CLARIFICATION OR RECONSIDERATION**

Scripps Howard Broadcasting Company ("Scripps"), the licensee of full-service television broadcast station KNXV-TV, Phoenix, Arizona, hereby requests clarification or, if necessary, reconsideration of the Memorandum Opinion and Order released in this proceeding on October 5, 2005 (the "*Order*") to specify that the *Order* does not preclude reimbursement by Sprint Nextel Corporation ("Sprint Nextel") of costs that would be

incurred in rebanding 2 GHz broadcast auxiliary service (“BAS”) stations used in connection with the operations of television translators or low power television (“LPTV”) stations.

KNXV-TV’s television signal is delivered to the residents of Mohave County, Arizona through a system of translators licensed to the Mohave County Board of Supervisors (the “Board”). Many years ago, the Board established this translator system as a means for providing regular over-the-air television service to the many remote communities and Indian reservations in the County. The Board uses translator relay stations in the 2 GHz band to pick up the broadcast signals of Phoenix area television stations, including KNXV-TV, and transmit them to the various translators serving the County. Translator relay station WPNA905, which is licensed to Scripps, is used to deliver KNXV-TV’s signal to Mohave County.

It is our understanding that Sprint Nextel has advised the Board and other broadcasters that the *Order* precludes “secondary BAS licensees” (*i.e.*, translator and LPTV licensees) from relocation cost reimbursement during the 2 GHz BAS transition. Scripps strongly disagrees with Sprint Nextel’s interpretation of the *Order* and urges the Commission to clarify that the *Order* does not in any way restrict Sprint Nextel’s obligation to reimburse BAS licensees for the relocation costs of 2 GHz facilities that are used in association with television translators and LPTV stations.

The arguments compelling the Commission to provide such clarification are set forth in the “Petition for Clarification or Reconsideration” being filed separately by the Board in this proceeding. Scripps has had an opportunity to review the Board’s pleading and wholeheartedly supports the Board’s position on the matter.

Accordingly, for the reasons set forth in the Board's "Petition for Clarification or Reconsideration," Scripps respectfully requests that the Commission clarify that the *Order* does not restrict Sprint Nextel's obligation to provide relocation cost reimbursement to licensees that use 2 GHz BAS facilities to support television translator and LPTV operations.

Respectfully submitted,

**SCRIPPS HOWARD BROADCASTING  
COMPANY**

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